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PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of: Michael L. Hill, el al.

Serial No.: 10/771,922

Filed: 02/04/2004

For: Guide plate for roller-chain conveyor

Examiner: RIDLEY, Richard

Group Art Unit: 3651

Attorney Docket No.: B31-180

CERTIFICATE OF MAILING

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May 16, 2005 /Brian C. Trask/
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APPEAL BRIEF

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Sir:

The following appeal brief is being submitted in triplicate and in accordance with the format set forth in 37 CFR §1.192(c). Included with this paper is check No. 1404, made payable to Commissioner of Patents in the amount of $250.00 as payment of the fee under 37 CFR §41.20(b)(2) for filing of a Brief in support of an Appeal by a small entity.

(1) REAL PARTY IN INTEREST

Michael L. Hill and Patrick G. Hill, the named inventors, are the real parties in interest.

(2) RELATED APPEALS AND INTERFERENCES

There are no related appeals or interferences.

(3) STATUS OF ALL CLAIMS

Claims 1-23 are all under final rejection.

(4) STATUS OF ALL AMENDMENTS

The reply filed on April 1, 2005 in response to the Final office action (Paper No. 5) has been entered in accordance with the advisory action (Paper No. 7) mailed May 2, 2005. However, contrary to provisions under MPEP 716.01(A)(3)(i), entry of the inventor's Declaration under 37 C.F.R. §1.132 (attached as Appendix A), showing that the invention solves a long felt need, produces unexpected results, enjoys commercial success, and is being copied by others, has been denied.

(5) CONCISE SUMMARY OF THE INVENTION

As shown in FIGs. 1 and 2, a roller-chain conveyor 100 includes a guide plate 116 adapted to support the load carried by the roller-chain conveyor belt, and to maintain the roller-chain on a consistent track. The guide plate 116 is carried on top of a stiff foundation plate 118 to resist load-induced bending deflection in the supported guide plate 116. Preferred conveyors 100 permit replacement of the guide plate 116 without requiring realignment of the foundation plate 118 with respect to the roller chain's sprockets 104,108.

Foundation plates 118 carry hold-down structure (e.g. 186, FIGs. 9,10) adapted for reception in socket structure 156 (see FIGs. 16-19) having an entrance 238 opening to the bottom surface of the guide plate 116. An operable socket structure includes a vertical well having a transversely arranged T-slot portion 240. A cooperating hold-down structure is a peg (e.g. 186 FIGs. 9-10) affixed to the foundation plate 118 to space an enlarged head 194 above the top surface of the foundation plate. The enlarged head 194 is sized in harmony with the socket 156 to permit

installing the enlarged head through entrance 238 into the vertical well portion of socket 156 for subsequent displacement of the enlarged head into the T-slot 240.

With such construction, the guide plate 116 may be installed by way of a slide-together fit, which encompasses lowering the guide plate 116 onto the foundation plate 118 to place the enlarged head 194 into reception in the well 238 of the socket. Then, the guide plate 116 is slid in a transverse direction to engage a rim of the T-slot 240 under the enlarged head 194. The enlarged head and rim form a structural interference to resist separation of the guide plate and foundation in a vertical direction. Such structure may also be characterized as forming a plug-then-slide arrangement, in that the guide plate 116 is first lowered to "plug" the peg into the socket, then guide plate 116 is "slid" to place the enlarged head into reception in the T-slot.

A vertical side surface of the illustrated rim 234 or socket can cause a structural interference with the stem 196 or head 194 of the peg to resist transverse motion of the guide plate beyond an installed position. Subsequent to the plug-then-slide assembly step, a retainer (e.g. 114, 226 FIG. 20) is typically installed to resist decoupling of the peg and socket during use of the conveyor. Guide plates 116 desirably are made from a tough plastic material, such as Tyvar 88.

(6) CONCISE STATEMENT OF ALL ISSUES PRESENTED FOR REVIEW

A. Are claims 1-23 properly rejected under 35 U.S.C. §103(a) over Besch?

B. Are claims 1, 2, 8, 13-16, and 18-23 properly rejected under 35 U.S.C. §103(a) over Sigfridsson et al.?

(7) GROUPING OF THE CLAIMS

A. Claims 1-23 do not stand or fall together. An explanation as to why these claims are separately patentable is presented in section (8A) below.

B. Claims 1, 2, 8, 13-16, and 18-23 do not stand or fall together. See section (8B) below for an explanation as to why these claims are separately patentable.

(8) ARGUMENT

A. Claims 1-23 under 35 U.S.C. §103(a) over Besch

The Final rejection of claims 1-23 under 35 U.S.C. §103(a) as being unpatentable over Besch is traversed. There has been no proper *prima facie* showing that the inventions defined by these claims would have been obvious to one of ordinary skill in the relevant art at the time the invention was made.

As understood, the Final rejection asserts that Besch's track 30 (FIG. 1) suggests the claimed guide plate, and his cross member 18 suggests the claimed foundation plate. Applicants submit that this rejection is based upon factual error. Besch's plurality of spaced apart cross members 18 fail to resist bending deflection of a guide plate 30 as a load is transported along track 30 between adjacent cross members 18. Structure effective to produce such bending support is specifically required by claims 1-16 and 18-22 . No motivation is pointed out in the Final rejection to modify Besch's disclosed structure to satisfy the requirement for bending support required by these claims. It appears to Applicants that making the asserted changes detrimentally would increase the cost of Besch's conveyor. Furthermore, simply replacing the spaced apart cross members with a continuous plate (arguendo, as a thought experiment in an attempt to form a structure within the ambit of claims 1-16 and 18-22) might interfere with assembly of the track 30 onto the modified plate by reducing access to fastener locations. Where a reference fails to suggest the desirability of making the modifications required to meet all of the claim limitations, a holding of obviousness would be improper (MPEP 706.02(j)).

Dependent claims 3-12 each require a guide plate to include a socket adapted to receive hold-down structure *as the guide plate is lowered* onto the foundation plate. Similarly, independent method claims 17 and 23 require, at step b), lowering the guide plate to place hold-down structure into reception in socket structure. Base claim 18, and its depending claims 19-22 similarly require structure of a guide plate to be arranged to effect a plug-then-slide removable connection. These claims all require a socket to be structured to receive hold-down structure as a guide plate is moved in a first direction (e.g. lowered), then subsequently to cause an interference as the guide

plate is moved in a second direction (e.g. slid in a transverse direction). In contrast, Besch discloses (FIG. 2) track 30 having an extruded profile completely devoid of any socket structure within the ambit of the instant claims. Besch is silent with respect to any structure operable to effect a "plug" installation procedure. Besch's track might be installed by sliding his track, but his fastener 50 must be slid in from an open end of the track. Besch's extruded track simply cannot be lowered to place the head of his fastener inside the track's cross-section. No motivation is pointed out in the Final rejection to modify Besch's disclosed structure to satisfy the requirement for a socket as recited in these claims.

Dependent claim 6 requires a vertical member of hold-down structure to cooperate with socket structure to resist motion of the guide plate in an axial direction, beyond an installed position. With reference to FIG. 2, Besch's extruded track 30 and fasteners 50 fail to suggest the claimed arrangement. The slot in extruded track 30 which receives the vertical shaft of bolt 50 lacks any structure arranged to interfere with the shaft of the bolt effective to resist axial motion of the track beyond an installed position. Apparently, and in contrast to the claimed arrangement, Besch relies upon the horizontal underside of his bolt head to generate a clamping force operable to hold his track in an installed position.

Dependent claim 8 requires a stem of hold-down structure to be press-fit into receiving structure of a foundation plate. In contrast, Besch discloses bolt 50 being in threaded reception in a nut (e.g. FIG. 2). Applicants submit that Besch's disclosed nut and bolt 50 inherently possess support conditions that are distinct and different from the claimed structure, and which preclude use of Besch's disclosed arrangement in the invention defined by claim 8. The claimed arrangement forms a pillar having a base fixed with respect to the foundation plate to support an enlarged head portion at a fixed elevation. Besch's nut does not operate as, or suggest, a foundation to hold hex head of bolt 50 at a fixed elevation to permit its assembly, as a blind fastener, into reception in a socket of the claimed guide plate. Besch's bolt 50 would inevitably fall under the influence of gravity to place its hex head in contact with the top surface of channel member 18, thereby frustrating assembly of a guide plate onto a foundation plate. Furthermore,

modifying the bolt 50 to meet the limitations recited in claim 8 would destroy utility of the bolt, since the bolt would no longer operate as a tension fastener required to hold Besch's track in an installed position. Therefore, motivation to make the modifications required to support the Final rejection is lacking in this reference.

With respect to claim 15, the Final rejection fails to point out where Besch suggests forming a structure including a lubricated interface having a dynamic coefficient of friction in the claimed range. With respect to claim 16, the Final rejection fails to point out where Besch suggests employing a material having the claimed mechanical wear properties of Tyvar 88. A proper *prima facie* showing simply has not been made in the Final rejection

With respect to claim 20, the Final rejection appears to admit that Besch not only does not disclose the recited retaining pin, but also fails to suggest such structure by avoiding any need for use of the claimed structure. Applicants submit that when a claim requires an element that is neither disclosed nor suggested by a reference, that claim patentably distinguishes over the structure disclosed by the reference.

With respect to claims 21 and 22, these claims add limitations to base claim 18 further defining a structural arrangement of a plurality of hold-down structures, not an arrangement of conveyors. Therefore, reciting additional conveyor structure, as apparently expected, would be irrelevant. In contrast to the claimed arrangement, Besch discloses a single hold down structure (bolt 50) disposed in his foundation plate 18. No motivation to modify his disclosed arrangement is pointed out in the Final rejection.

The Final rejection of claims 1-23 under 35 U.S.C. §103(a) as being unpatentable over Besch is improper, and should now be reversed.

B. Claims 1, 2, 8, 13-16, and 18-23 under 35 U.S.C. §103(a) over Sigfridsson et al.

The Final rejection of claims 1, 2, 8, 13-16, and 18-23 under 35 U.S.C. §103(a) as being unpatentable over Sigfridsson et al. is traversed. There has been no proper *prima facie* showing that the inventions defined by these claims would have been obvious to one of ordinary skill in the relevant art at the time the invention was made. In fact, the Final rejection does not point out with any specificity whatsoever as to how Sigfridsson et al. are applied in formulating the rejection.

As understood, the Final rejection asserts that Sigfridsson et al.'s guide track 33 (FIG. 2) suggests the claimed guide plate, and their supporting beam 31 suggests the claimed foundation plate. However, at Col 9, lines 37-41, Sigfridsson et al. disclose fastening the track 33 to the beam 31 with screw joints or other fasteners. Such disclosure stops well short of suggesting the installation procedure, or attachment structure, required by all of the pending claims.

In general, the arguments previously presented in section 8A. in connection with Besch appear to be equally applicable to Sigfridsson et al. Because the Final rejection does not point out with any specificity how Sigfridsson et al. are applied in formulating this Final rejection, such arguments will not be repeated in full here. As one example, Sigfridsson et al. fail to even suggest installing a guide plate onto a foundation plate using socket structure adapted to cooperate with hold down structure, such as required by method claim 23.

Furthermore, base claim 1 requires structure arranged to form a "slide-together fit structured to form an interference". Independent method claims 17 and 23 require a lower and slide procedure, recited in steps b) and c), to install a guide plated onto a foundation plate. Base claim 18 requires structure arranged to effect a plug-then-slide installation of a guide plate onto a foundation plate. No showing has been made that the reference suggests advisability of making modifications to Sigfridsson et al.'s illustrated structures effective to form modified structure falling within the ambit of any of the independent claims.

Dependent claims 2, 8, and 13-16 variously depend from base claim 1, thereby also requiring structure arranged to slide together to form an interference. Dependent claims 19-22 variously depend from base claim 18, thereby also requiring structure of a guide plate and a foundation plate to be arranged to form an interference effective to attach the guide plate to the foundation plate. Sigfridsson et al. are silent with respect to sliding their track 33 along beam 31 to cause an interference effective to resist separation of the track from the beam.

The Final rejection of claims 1, 2, 8, 13-16, and 18-23 under 35 U.S.C. §103(a) as being unpatentable over Sigfridsson et al. is improper, and should now be reversed.

APPENDICES

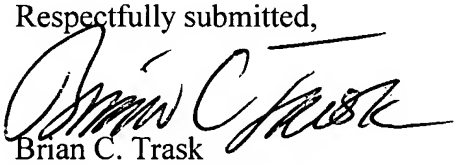
A copy of the inventor's declaration under 37 C.F.R. §1.132 is attached as Appendix A to this brief. A copy of claims 1-23 is attached as Appendix B to this brief.

CONCLUSION

For a proper 35 USC 103 rejection, both the teaching or suggestion to make the claimed combination and the reasonable expectation of success for that combination must be found in the prior art, and not based upon applicant's disclosure (.MPEP 706.02(j)) No such teaching or suggestion has been shown in this case. All of the 103 rejections should therefore be reversed.

The rejections of Claims 1-23 should be reversed, and the application should be returned to the primary examiner with instructions to issue a Notice of Allowance.

Respectfully submitted,



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Brian C. Trask
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DECLARATION under 37 C.F.R. 1.132

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Sir:

1. I, Michael L. Hill, am one of the joint inventors of the subject matter which is claimed and for which patent protection is sought on the above-referenced invention entitled: "Guide plate for roller-chain conveyor".

2. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true.

3. Sharp chain conveyors structured in substantially the same way have been used in the lumber industry for well over 20 years.

4. Sharp chain conveyors used in the lumber industry traditionally include a guide plate surface structured from hardened steel.

5. Hampton Lumber Co., the largest producer of dimensional lumber in North America, owns saw mills having several sharp chain conveyors in each mill.

6. A representative life span of a prior art hardened steel guide plate of a sharp chain conveyor used in a Hampton Lumber Co. sawmill is about six months.

7. A representative life span of a sharp chain used with a prior art hardened steel guide plate of a sharp chain conveyor in a Hampton Lumber Co. sawmill is about six months.

9. Although a certain reduction in oil consumption was anticipated, oil consumption of a single sharp chain conveyor in a Hampton Lumber Co. sawmill unexpectedly decreased from about 2,350 gallons per month to only about 250-275 gallons per month subsequent to installation of a guide plate assembly structured according to the instant invention.

10. Demonstrated life span of the Tyvar(TM) plastic guide plates used in a Hampton Lumber Co. sawmill has unexpectedly increased to in excess of 19 months (still not worn out), compared to the approximately six month life of a prior art hardened steel guide plate, and anticipated six month life of the improved guide plate.

11. Life span of a sharp chain used with guide plates structured according to the instant invention has unexpectedly increased to at least nine months, compared to the anticipated substantially equivalent life span.

12. The failure mode of a sharp chain used with a guide plate structured according to the instant invention in a Hampton Lumber Co. sawmill has unexpectedly changed from fatigue fracture of the side plate to wear of the rollers.

13. Subsequent to a demonstration field test of an improved guide plate assembly, Hampton Lumber Co. has replaced 100% of their prior art hardened steel guide plate assemblies with guide plate assemblies structured according to the invention.

14. According to Al Rasmasen in the Maintenance department at Caffel Brothers of 540 3rd Ave., Vancouver, WA 98632, a sawmill specializing in cedar products, the prior art conveyor having a steel guide plate had a life span of about three months, while a replacement conveyor structured according to the instant invention has surprisingly lasted almost a full year, and is not yet worn out.

15. On information and belief, representatives from two equipment manufacturing companies (COE & NEUNES MEGEHEE, Canada P O Box 8 Salmon Arm Canada v1e4n2; and CAN-AM CHAINS, P O BOX 5087 PORTLAND OREGON 97208) have made visits to Wilamina Lumber Mills to gather information on our design, and have made offers to sell the imitation to Wilamina Lumber Co.

16. And finally, I acknowledge that the foregoing statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001 and that such willful false statements may jeopardize the validity of the above-referenced application or any patent issued thereon.

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APPENDIX B

Pending claims

Following is a complete listing of all pending claims:

1. (Previously amended) In a conveyor of the type in which a length of roller-chain is entrained around first and second spaced apart sprocket assemblies to dispose a stretch of the roller-chain for load bearing on a guide plate interposed between the first and second sprocket assemblies and with the roller-chain being operable to transport a load in an axial direction defined by an axis oriented along the stretch of roller-chain, the improvement comprising:

a bed plate comprising a foundation plate and said guide plate, a top surface of said foundation plate receiving a bottom surface of said guide plate in a stacked arrangement effective to provide a normal support operable to resist bending deflection of said guide plate as a load is transported from a first end to a second end of said guide plate, said stacked arrangement further encompassing a slide-together fit structured to form an interference between structure associated with said foundation and structure associated with said guide plate, said interference being effective to resist separation of said guide plate away from said foundation plate in a direction normal to said top surface, wherein:

said foundation plate is adapted for attachment to structure of said conveyor; and

said guide plate is adapted for removable attachment to said foundation plate.

2. (Original) The improvement of claim 1, wherein:

said foundation plate comprises a metal; and

said guide plate comprises a plastic.

3. (Previously amended) The improvement of claim 1, wherein:

said foundation plate comprises a hold-down structure disposed on said top surface of said foundation plate; and

said guide plate comprises a socket disposed on said bottom surface of said guide plate, wherein:

a first portion of said socket is structured and arranged to receive said hold-down structure as said guide plate is displaced in a first direction that is substantially normal to said top surface; and

a second portion of said socket is structured and arranged to cause a structural interference with a portion of said hold-down structure subsequent to a displacement of said guide plate, in a second direction that is substantially transverse to said first direction, effective to accomplish said slide-together fit.

4. (Original) The improvement of claim 3, wherein:

said hold-down structure comprises a vertical member and a transverse member, said vertical member spacing said transverse member apart from said top surface;

said socket comprises a rim; and

in said installed configuration, said transverse member creates a structural interference with said rim to resist separation, in a direction normal to said top surface of said foundation plate, of said guide plate away from said foundation plate.

5. (Original) The improvement of claim 4, further comprising:

a plurality of hold-down structures distributed over an area of said foundation plate and a plurality of sockets arranged to engage with said plurality of hold-down structures.

6. (Original) The improvement of claim 4, wherein:

said vertical member of said hold-down structure is further arranged in harmony with structure of said socket whereby to resist motion in said axial direction of said guide plate with respect to said foundation plate beyond said installed configuration.

7. (Original) The improvement of claim 3, wherein:
said hold-down structure comprises an enlarged head carried on a substantially vertical stem.

8. (Original) The improvement of claim 7, wherein:
said stem is press-fit into receiving structure of said foundation plate.

9. (Original) The improvement of claim 7, wherein:
said stem is threaded into receiving structure of said foundation plate.

10. (Original) The improvement of claim 3, wherein:
said socket comprises a T-slot.

11. (Original) The improvement of claim 3, wherein:
said socket is disposed within a thickness of said guide plate to leave a top surface of said guide plate uninterrupted over a location of said socket.

12. (Original) The improvement of claim 3, wherein:
a hold-down system operable to resist motion, in a direction parallel to said top surface, of said guide plate relative to said foundation plate to retain said guide plate in said installed configuration, comprises:
a fastener disposed near an end of said guide plate for anchoring to structure associated with said foundation plate; and
a standoff disposed to receive said fastener through a thickness of said guide plate, said standoff being configured and arranged to resist over-tightening of said fastener.

13. (Original) The improvement of claim 1, wherein:
a lubricated sliding interface between said roller chain and said second material has a coefficient of friction lower than a corresponding coefficient of friction between steel-on-steel.

14. (Original) The improvement of claim 1, wherein:

a lubricated sliding interface between said roller chain and said second material has a coefficient of friction lower than a corresponding coefficient of friction between said roller chain and a hardened steel surface.

15. (Original) The improvement of claim 1, wherein:

a lubricated sliding interface between said roller chain and said second material has an effective dynamic coefficient of friction lower than about 0.08.

16. (Original) The improvement of claim 1, wherein:

said guide plate comprises a sheet of plastic material having mechanical wear properties at least substantially equivalent to Tyvar 88 plastic material.

17. (Previously amended) A method for installing a guide plate for a roller-chain onto a roller-chain type conveyor, comprising the steps of:

a) disposing said guide plate at an elevated position with respect to, and substantially covering, a top surface of a foundation structure;

b) lowering said guide plate for stacked engagement, at a first position disposed substantially underneath said elevated position, to orient a bottom surface of said guide pate substantially in the plane of said top surface of said foundation structure to place hold-down structure carried by said foundation structure into reception in retention socket structure, said socket structure being disposed in a thickness, and opening to a bottom surface, of said guide plate;

c) transversely sliding said guide plate to a second position to engage a first portion of said holding structure with a second portion of said socket structure to form a structural interference between said first portion and said second portion operable to resist a displacement, in a direction normal to said top surface, of said guide plate away from said foundation structure; and

d) installing a stop element to resist motion of said guide plate from said second position.

18. (Previously amended) A bed plate for a roller-chain conveyor assembly, the bed plate comprising:

a foundation platform and a guide plate, a top surface of said foundation platform receiving a bottom surface of said guide plate in a stacked arrangement, wherein:

said foundation platform is adapted for attachment to structure of said conveyor to establish an alignment of said guide plate with respect to a portion of a roller chain of said conveyor assembly, said foundation platform further being structured to provide a distributed support for said bottom surface operable to resist bending deflection of said guide plate under a load transported along said conveyor assembly; and

said guide plate is adapted for removable attachment to said foundation platform by way of structure comprising a plug-then-slide arrangement configured to permit replacement of said guide plate without compromising said alignment, a top surface of said guide plate carrying a plurality of ridge elements, said ridge elements being configured for reception between side plates of a strand of said roller-chain whereby to guide said strand along an axial path, a top surface of said ridge elements being adapted to support a roller element of said roller-chain for rolling engagement thereon.

19. (Original) The bed plate of claim 18, further comprising:

first hold-down structure carried by said guide plate and second hold-down structure carried by said foundation platform, said first and second hold-down structure being mutually arranged to form an interlocking engagement effected by a displacement of said guide plated relative to said foundation platform, said engagement forming a structural interference operable to resist displacement of said guide plate in a direction normal to said top surface of said foundation platform, away from engagement with said foundation platform.

20. (Original) The bed plate of claim 19, further comprising:

a retaining pin installable to pierce structure associated with said guide plate for reception of a portion of said retaining pin in structure associated with said foundation platform, said retaining pin being adapted to resist an axial displacement of said guide plate from an installed axial position.

21. (Previously presented) The bed plate of claim 18, wherein:

said removable attachment is effected between a plurality of hold-down structures disposed in a plurality of rows and columns over an area of said foundation structure and a plurality of cooperatingly structured and arranged T-slot structures carried by said guide plate.

22. (Previously presented) The bed plate of claim 21, wherein:

one of said hold-down structures comprises a stem affixed at a first end to said foundation platform, a second of said stem carrying an enlarged head, said stem having a length between said first and second ends sized such that said enlarged head is spaced apart from said top surface; and

said enlarged head is configured in harmony with a socket portion of a said T-slot for insertion of said head, in a first direction, into reception in said socket, and subsequent transverse displacement of said head with respect to said socket, in a second direction effective to trap a shoulder portion of said T-slot between a portion of said head and said top surface.

23. (Previously presented) A method for installing a guide plate for a roller-chain onto a roller-chain conveyor of a saw mill without necessitating removal of the chain drive sprockets associated with that guide plate, comprising the steps of:

a) disposing said guide plate at an elevated position with respect to, and substantially overlapping, a top surface of a foundation structure;

b) lowering said guide plate into engagement with said foundation structure to place hold-down structure in reception within retention socket structure;

c) transversely sliding said guide plate to form a structural interference operable to resist a displacement, in a direction normal to said top surface, of said guide plate away from said foundation structure; and

d) installing a stop element to resist motion of said guide plate from an installed position.